



**American Water Works
Association**

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March 21, 2019

Robert Courtnage
National Program Chemicals Division (Mail Code 7404T)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Asbestos; Significant New Use Rule, Docket No. EPA-HQ-OPPT-2018-0159

Mr. Courtnage:

The question of whether asbestos cement pipe is still in use in the United States arose in the above referenced docket. The American Water Works Association has contacted fellow associations with relevant expertise, water supply product certification agencies, water systems with historic AC pipe installations, and subject matter experts within our membership regarding the potential for continued importation or use of AC pipe in the U.S. We found the following:

1. AWWA Standards – All AWWA standards for AC pipe and AC pipe installation have been withdrawn. Many if not all state Safe Drinking Water Act primacy agencies, professional civil engineers, and water utilities reference AWWA standards in designing community water system water distribution systems as well as procuring pipe and pipe installation services. Please note that AWWA maintains standards for concrete pressure pipe, which is distinctly different from AC pipe, and uses Portland cement in the concrete and mortar, but no asbestos.
2. NSF 61 – Nationwide, state SDWA primacy agencies (except for Hawaii) require that products that come in contact with drinking water, including distribution system piping, adhere to NSF 61. Listings of certified pipe products are available on-line from NSF International and UL; neither contains AC pipe products. UL and NSF are the largest standard certification organizations in the water sector; their staff confirmed this assessment for products certified by their organization.
3. U.S. pipe producers are not importing AC pipe – Manufacture of AC pipe in the U.S. is not allowed. Manufacturers in AWWA's membership, as well as members of associations for concrete and iron pipe products indicate they are focused on producing their own products for sale and are not aware of importation of a competing product line made of asbestos cement.

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4. Distributors provide products that are specified – AWWA's members include the major distributors of water pipe product lines. Distributors contacted did not recall maintaining AC pipe products since before the initial ban on asbestos products in the U.S. They also commented that in addition to the regulatory and health concerns associated with AC pipe, there were products with better performance characteristics available.
5. Utilities are replacing existing AC pipe with alternative materials – Utilities report that AC pipe was installed for a period of time and that as that pipe reaches the end of its useful life, utilities are replacing it with modern pipe. This can be done in keeping with applicable requirements under the Clean Air Act, Occupational Safety and Health Administration standards, and Comprehensive Environmental Response, Compensation and Liability Act.
6. Contractors responsible for installation must assure that pipe products received for installation are those specified – As noted above, water systems are not specifying the installation of AC pipe. Consequently, in addition to maintaining compliance with proper personal protective and disposal practices for installed AC pipe encountered in the field, contractors monitor received shipments of pipe to assure that newly installed pipe meets specifications for the installation at hand.

If you have any questions regarding this correspondence or if AWWA can be of assistance in some other way, please contact me or Steve Via at (202) 326-6130 or svia@awwa.org.

Best regards,



G. Tracy Mehan, III

Executive Director – Government Affairs

cc: Alexandria Dunn, EPA/OPPT
Jennifer McLain, EPA/OW/OGWDW

Who is AWWA

The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our 50,000-plus total membership represents the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.